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13
14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC
21 COMPANY,**

22 **Debtors.**

- 23 Affects PG&E Corporation
24 Affects Pacific Gas and Electric Company
 Affects both Debtors

25 * *All papers shall be filed in the Lead Case,
26 No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

NOTICE OF FILING OF REVISED
PROPOSED ORDER APPROVING
DEBTORS' FIRST OMNIBUS REPORT AND
OBJECTION TO CLAIMS ASSERTED
PURSUANT TO 11 U.S.C. § 503(b)(9)

Re: Dkt. No. 2896
Date: August 14, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

4 **PLEASE TAKE FURTHER NOTICE** that on March 1, 2019, the Bankruptcy Court entered
5 that certain *Amended Order Pursuant to 11 U.S.C. §§ 503(b)(9) and 105(a) Establishing Procedures for*
the Assertion, Resolution, and Satisfaction of Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [Dkt.
6 No. 725] (the “**503(b)(9) Procedures Order**”), pursuant to which the Court established certain
7 procedures (the “**503(b)(9) Procedures**”) to govern the resolution of any claims (the “**503(b)(9)**
Claims”) that may be asserted against the Debtors by various claimants (each a “**Claimant**”) pursuant
to section 503(b)(9) of the Bankruptcy Code.

8 **PLEASE TAKE FURTHER NOTICE** that on July 8, 2019, in accordance with the 503(b)(9)
9 Procedures Order, the Debtors filed their first omnibus report and objection (“**Objection**”) to the
10 503(b)(9) Claims [Dkt No. 2896]. A proposed form of Order with respect to the relief sought therein
11 was attached as **Exhibit A** to the Objection (the “**Original Proposed Order**”).

12 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Objection is scheduled to be
held on **August 14, 2019, at 9:30 a.m. (Pacific Time)** (the “**August 14 Omnibus Hearing**”) at the
13 Bankruptcy Court in the courtroom of the Honorable Dennis Montali, United States Bankruptcy Judge,
Courtroom 17, 16th Floor, 450 Golden Gate Avenue, San Francisco, California 94102. Unless
14 previously agreed to by stipulation, oppositions or responses, if any, to the relief requested in the
Objection were required to be filed and served on or before July 31, 2019 at 4:00 p.m. (Pacific Time)
15 (the “**Objection Deadline**”).

16 **PLEASE TAKE FURTHER NOTICE** that, on July 29, 2019, the Debtors filed a stipulation,
17 [Docket No. 3306] (the “**Omnibus Extension Stipulation**”), which Stipulation was granted by the
Bankruptcy Court on August 2, 2019 [Docket No. 3365] (the “**Omnibus Extension Order**”),
extending the deadline to respond to the Objection for the holders of the following 503(b)(9) Claims:
18 503(b)(9) Claim Nos. 999, 1376, 1379, 2122, 2129, 2165, 2355, 2391, 2445, 2449, 2454, 2477, 2478,
2519, 2530, 2538, 2549, 2556, 2560, 2575, 2577, 2598, 2605, 2610, 2633, 2642, 2645, 2646, 2653,
2655, and 2830 (collectively, the “**Extended 503(b)(9) Claims**”) and excluding the Extended
20 503(b)(9) Claims from any Order to be submitted by the Debtors on the Objection at the August 14
Omnibus Hearing.

21 **PLEASE TAKE FURTHER NOTICE** that the Debtors received formal responses to the
Objection from the holders of the following 503(b)(9) Claims: Petro-Canada America Lubricants, Inc.
(503(b)(9) Claim No. 2505) [Dkt No. 3263], C.H. Reynolds Electric, Inc. (503(b)(9) Claim No. 2639)
[Dkt No. 3267], Shiloh IV Lessee, LLC (503(b)(9) Claim No. 2447) [Dkt No. 3284], Marsh Landing
LLC (503(b)(9) Claim No. 2026) [Dkt No. 3286], Global Ampersand LLC (503(b)(9) Claim Nos. 1378
and 1842) [Dkt No. 3288], and Hypower, Inc. (503(b)(9) Claim No. 1386) [Dkt No. 3315]
(collectively, the “**Responses**” and the claims subject to the Responses, the “**Responding 503(b)(9)**
Claims,” and, together with the Extended 503(b)(9) Claims, the “**Continued 503(b)(9) Claims**”). A
25 notice of continued hearing with respect to the Continued 503(b)(9) Claims is being filed
26 contemporaneously hereto.

28 **PLEASE TAKE FURTHER NOTICE** that, attached hereto as **Exhibit 1-1** and **Exhibit 1-2**,
respectively, are copies of the Debtors’ revised proposed Order on the Objection (the “**Revised**

Proposed Order") and a redline comparison of the Revised Proposed Order against the Original Proposed Order, which (a) excludes the Continued 503(b)(9) Claims from the Revised Proposed Order; (b) incorporates certain amendments and revisions to resolve the issues and concerns raised in certain formal and informal responses to the Objection; and (c) incorporates revised treatments with respect to certain of the Responding 503(b)(9) Claims.

PLEASE TAKE FURTHER NOTICE that the Debtors reserve the right to further amend, modify, or supplement the proposed order on the Objection at any time up to and during the Omnibus Hearing.

PLEASE TAKE FURTHER NOTICE that copies of the pleadings and other documents identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

Dated: August 12, 2019

**WEIL, GOTSHAL & MANGES LLP
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/s/ Jane Kim
Jane Kim

Attorneys for Debtors and Debtors in Possession